

Hon. Richard A. Jones
Trial Date: NOT SCHEDULED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

LARRY DEAN LAMBOURN,

Plaintiff,

vs.

SENTINEL DREAM II HOLDINGS, LLC,
MARC PFEFFERLE, ERIC D. BOMMER,
STEVE CUMBOW, MATTHEW R. KAHN,
CHRIS BAKER, MICHAEL J. FABIAN,
ROSE RUIZ, JANE/JOHN DOES 1
THROUGH 10, and THE MARITAL
COMMUNITY OF EACH NONBUSINESS
DEFENDANT

Defendants.

NO. 2:22-cv-00373-RAJ

STATUS REPORT

(Jury trial requested.)

Pursuant to the Court's order dated January 26, 2023, Plaintiff provides this status report and requests that the Court continue the stay in this matter and schedule another status report for April 15, 2024. Plaintiff bases this request on the same reasoning set forth in Plaintiff's *Status Report*, Dkt. 17, in this matter and the facts set forth below. To avoid repetition, Plaintiff does not repeat here the explanation that is contained in Docket No. 17.

The bankruptcy proceeding appears to be nearing a conclusion. After Plaintiff filed Docket No. 17, the plan administrator for the wind down trust in the bankruptcy case has twice

STATUS REPORT - 1
NO. 2:22-cv-373

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1 stated that the administrator anticipates that it will file an application for a Final Decree on
 2 **March 13, 2024.** *Post-confirmation Report*, Dkt. 603, p. 7 (April 17, 2023); *Post-confirmation*
 3 *Report*, Dkt. 604, p. 8 (July 13, 2023). Additionally, on April 12, 2023, the Bankruptcy Court for
 4 the Southern District of New York stated that it would not extend the deadline for the claims-
 5 objections beyond October 30, 2023, absent a “strong showing” that an extension was needed.

6 The Court intends that October 30, 2023 will be the final deadline for claim
 7 objections. No further extension of the Claims Objection Deadline will be granted
 8 in the absence of a strong showing that circumstances did not reasonably permit
 compliance with the deadline.

9 *Order Further Extending the Periods to File Objections to Claims*, Dkt. 602, p. 2 (In re HSP
 10 Liquidation LLC et al., Case No. 19 – 11608 (MEW)).

11 As explained in Plaintiff’s prior status report in this matter, Dkt. 17, Plaintiff needs to
 12 avoid incurring unnecessary fees litigating in the U.S. Bankruptcy Court in the Southern District
 13 of New York to oppose the plan administrator’s unfounded argument about Plaintiff’s claims in
 14 this Court. Continuing the stay in this case until after the Bankruptcy Court enters a final decree
 15 should accomplish that need. Accordingly, Plaintiff requests that this Court continue the stay and
 16 order another status report be issued in July 2023.

17 I certify that this memorandum contains 332 words in compliance with the local rules.

18 EXECUTED in Issaquah, Washington this August 1, 2023.

19
 20 /s/ John Barton
 21 John G. Barton, WSBA No. 25323
 22 Attorney for Plaintiffs
 23 1567 Highlands Dr NE Ste 110-34
 24 Issaquah, WA 98029-6245
 25 (425) 243-7960
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DECLARATION OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on this date, I did not send this *Status Report* to any other party as no defendant has appeared in this action.

EXECUTED at Issaquah, Washington this August 1, 2023.

/s/ John Barton
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Attorney for Plaintiffs
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